

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

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Case No. 3:21-cv-00259
[Lead Case]

ROY CHARLES BROOKS, *et al.*

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

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Case No. 1:21-cv-00988
[Consolidated Case]

DEFENDANTS' DESIGNATION OF EXPERTS

Pursuant to the Court's Scheduling Order, *see* ECF 96, Defendants designate the following expert witness for the hearing on the Brooks Plaintiffs' preliminary-injunction motion.

I. Retaining Testifying Experts

Dr. John R. Alford
Rice University
Department of Political Science
P.O. Box 1892 Houston, Texas 77251-1892
713-348-3364 | jra@rice.edu

II. Non-Retained Expert Witnesses

Defendants designate and intend to call the Brooks Plaintiffs designated experts—Dr. Matt Barreto and Dr. Jeronimo Cortina—for the purpose of fact or opinion testimony. Defendants do not concede qualifications, relevancy, reliability, or admissibility of those witnesses' testimony.

* * *

Defendants cross designate and reserve the right to call any expert witness identified or designated by any party or employee or representative of any party, again without conceding the qualifications, relevancy, reliability, or admissibility of those witnesses' testimony.

Defendants reserve the right to supplement this designation as necessary.

Date: January 14, 2022

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

Respectfully submitted.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN
Deputy Attorney General for Special
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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was served on all parties via electronic mail on January 14, 2022.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN